

**EXHIBIT A**

**AFFIDAVIT OF JUGRAH KAUR  
WIFE OF KIRPAL SINGH**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

Case No. 20-CV-5855

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ESTEBAN MARQUEZ,

Plaintiff,

Vs.

**AFFIDAVIT OF JUGRAJ KAUR**

INDIAN TAJM INC.  
d/b/a SANTOOR INDIAN RESTAURANT  
BALVINDER SINGH, HARMINDER SINGH,  
JOGINDER SINGH, KIRPAL SINGH, and  
MEHANGA SINGH.

Defendants.  
-----X

JUGRAJ KAUR sworn or affirmed deposes and says:

1. I Jugraj Kaur am the wife of Kirpal Singh the above captioned Defendant. My affidavit is also based on my personal knowledge.
2. I am the one writing this affidavit because my husband had a massive stroke back in February 2019 and is now disabled and unable to appear in this action. As we have already made the Court aware he was diagnosed with cerebral infarction and vascular dementia and has multiple health problems.
3. We recently had my husband examined by his neurological physician. The reason we had this exam completed was to demonstrate clearly and unequivocally that my husband Kirpal Singh the defendant in this case is incapable of defending this action due to brain impairment. He is not able to process the many questions in a deposition and his memory is no longer intact. His degree of impairment was also stated in the doctor's affirmation of Jacob Matthew, MD. This convinced the court to permit my husband to be assigned a Guardian Ad Litem Anthony J. Cassese, Esq. who is overseeing the work of Manuel Moses, Esq. my attorney in advocacy for my disabled husband.
4. I have reviewed the affidavit of service in this case annexed to this affidavit. It says that my

husband was served on May 18, 2021. This is impossible as my husband is in no condition to accept service of process. The address where he is alleged to have been served was 257-05 Union Turnpike Glen Oaks, New York which is the restaurant he formerly held an interest in, and his share was sold on September 8, 2020.

5. I have a joint account with my husband. This account has been locked down, because of this judgment on default, and we are unable to get the funds from the account. This is how the lawsuit first came to my attention.
6. Money going into the account included the following: I began to collect my social security in January 2014, my pension in July 2014. My husband began collecting social security in March 2010. My monthly pension \$5000 and my social security is \$2200 per month. And my husband's social security is \$1200 per month. This money should be protected from any debt collection and so the bank restraint lifted immediately. It should be noted that I waive any potential conflict of interest in this case between me and my husband.
7. Moreover, at this point my husband can no longer properly defend this action. He unable to even testify. Mr. Esteban Marquez has waited far too long in bringing this case. This has resulted in extreme prejudice to a defense of this matter. This judgment should be vacated and the case dismissed. If this Court will not decide in dismissal based on a failure to timely prosecute then I request that my attorney be allowed to file an answer on behalf of my husband.

**In Conclusion:** I request that the Court lift the restraint; vacate the judgment; dismiss the case or in the alternative or if not allow Manuel Moses, Esq. to interpose an answer and defenses with the oversight of the G.A.L. Anthony Cassese and for any other relief this Court may deem to be just, fair, and proper.

I affirm this 18th day of July 2025, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

Jugraj Kaur  
\_\_\_\_\_  
JUGRAJ KAUR

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Index No. 20-CV-5855  
File No.

DISTRICT COURT, COUNTY OF EASTERN NY

ESTEBAN MARQUEZ

Plaintiff(s)

against

INDIAN TAJ, INC. D/B/A SANTOOR INDIAN RESTAURANT, BALVINDER SINGH, HARMINDER SINGH, JOGINDER SINGH, KIRPAL SINGH AND MEHANGA SINGH

Defendant(s)

State of New York, County of Nassau

SS

HUSAM AL-ATRASH being duly sworn, deposes and says: that deponent is not a party to this action, is over 18 years of age and resides at

BROOKLYN

NY

11228

That on 5/18/2021 at 12:00 n at PLACE OF BUS. at  
257-05 UNION TPKE  
GLEN OAKS NY 11004

deponent served the within  
SUMMONS

FIRST AMENDED COMPLAINT

on KIRPAL SINGH  
(Defendant/Respondent) herein known as Recipient

Said service was effected in the following manner:

**SUITABLE AGE PERSON**

by delivering a true copy of each to MS. JANE (REFUSED FULL NAME) CO-WORKER  
a person of suitable age and discretion. Said premises is defendant's actual place of business-dwelling  
house usual place of abode within the state

**APPROXIMATE DESCRIPTION**

<u>SEX</u>	<u>FEMALE</u>	<u>COLOR</u>	<u>BROWN</u>	<u>HAIR</u>	<u>BLACK</u>	<u>HEIGHT</u>	<u>5'3"</u>	<u>WEIGHT</u>	<u>140</u>
<u>AGE</u>	<u>30</u>	<u>OTHER</u>							

**MAILING**

On 5/21/2021 deponent mailed a copy of same to respondent at  
257-05 UNION TPKE

GLEN OAKS NY 11004

by regular 1st class mail in an envelope bearing the legend "personal and confidential" and not  
indicating on the outside thereof, by return address or otherwise, that the communication is from an attorney or  
action against the person.

**MILITARY CONFIRMATION**

I asked the person spoken to

MS. JANE (REFUSED FULL NAME)

whether recipient is in active military service of the United States in any capacity whatever.

Person answered in the negative.

Sworn to before me on

*Shahat G B*

SHAUL HORAN  
Notary Public, State of New York  
No. 01HO6108246  
Qualified in Nassau County  
Commission Expires 04/12/2020

Brill Uri  
Notary Public, State of New York  
No. 01BR6394019  
Qualified in Nassau County  
Commission Expires 07/01/2023

HUSAM AL-ATRASH  
1279639

Signature: Jugraj Kaur  
Jugraj Kaur (Jul 18, 2025 11:27 EDT)

Email: jkaur1948@gmail.com

# EXHIBIT A AFF. MS. KAUR

Final Audit Report

2025-07-18

Created:	2025-07-18
By:	Manuel Moses (jibaru@nyc.rr.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAA73cRNpOY24dePBAERLqmMs1MApV7LH0X

## "EXHIBIT A AFF. MS. KAUR" History

Document created by Manuel Moses (jibaru@nyc.rr.com)

2025-07-18 - 3:14:55 PM GMT- IP address: 68.174.157.177

Document emailed to Jugraj Kaur (jkaur1948@gmail.com) for signature

2025-07-18 - 3:14:58 PM GMT

Email viewed by Jugraj Kaur (jkaur1948@gmail.com)

2025-07-18 - 3:23:14 PM GMT- IP address: 64.233.172.204

Document e-signed by Jugraj Kaur (jkaur1948@gmail.com)

Signature Date: 2025-07-18 - 3:27:10 PM GMT - Time Source: server- IP address: 173.77.222.221

Agreement completed.

2025-07-18 - 3:27:10 PM GMT



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